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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

AVNER MANDLER)
Plaintiff,) Case NO. 2:13-cv-1636-GMN-GWF
v.)
CAROLYN W. COLVIN,)
Commissioner of Social Security Administration,)
Defendant.)
STIPULATION FOR A SIXTY-DAY
EXTENSION OF TIME FOR
DEFENDANT TO FILE OPPOSITION
AND/OR CROSS-MOTION TO
PLAINTIFF'S MOTION FOR
REMAND AND/OR REVERSAL

IT IS HEREBY STIPULATED, by and between Plaintiff Avner Mandler (Plaintiff) and Defendant Commissioner of Social Security (Defendant), by and through their respective counsel of record, that Defendant shall have an extension of time of sixty (60) days to respond to Plaintiff's Motion for Remand and/or Reversal. The current due date is March 5, 2014. The new due date would be May 5, 2014. This is the first extension of time requested by Defendant. Defendant requires additional time

1 because the attorney assigned to this matter was out of the office for a week in February with asthmatic
2 bronchitis and has ten dispositive motions due in the month of March. Counsel needs additional time to
3 respond to the issues that Plaintiff raises in her motion due to counsel's heavy briefing schedule and
4 leave in February. The parties further stipulate that the Court's Scheduling Order shall be modified
5 accordingly.

6 Date: March 4, 2014

7 MARC V. KALAGIAN ATTORNEY AT LAW

8 By: /s/ Marc V. Kalagian
9 Marc v. Kalagian
10 Attorney for the Plaintiff
(Authorized on March 4, 2014)

11 Date: March 4, 2014

12 MELINDA HAAG
United States Attorney

13 By: /s/ Carolyn Chen
14 Carolyn Chen
15 Special Assistant United States Attorney
Attorney for Defendant

16 OF COUNSEL TO DEFENDANT:

17 DONNA L. CALVERT
18 Acting Regional Chief Counsel, Region IX

19 SHARON LAHEY
20 Assistant Regional Counsel

21 **ORDER**

22 PURSUANT TO STIPULATION, IT IS SO ORDERED. DEFENDANT SHALL FILE
23 OPPOSITION AND/OR CROSS-MOTION TO PLAINTIFF'S MOTION FOR REMAND AND/OR
24 REVERSAL ON OR BEFORE MAY 5, 2014. PLAINTIFF SHALL FILE HIS REPLY THERETO, IF
ANY, ON OR BEFORE MAY 19, 2014.

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26 Dated: March 5, 2014

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HON. GEORGE FOLEY, JR.
UNITED STATES MAGISTRATE JUDGE